

R

DOCUMENT NUMBER
PROPOSED RULE PR *misc notice*
Reg Guide

...
...
...

ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

TELEPHONE
AREA CODE 716 246-2700
Extension 2513

January 19, 1981



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

Dear Sir:

Following is a comment pertaining to: Second Proposed Revision 3 to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)". Specifically, the comment addresses section B. Discussion, paragraph 9, page 7-8 on quality assurance organization.

Sufficient authority and organizational freedom to identify quality problems does not seem to be affected positively or negatively by whether or not an on-site quality group reports to station management or to off-site quality assurance management. Pather, per my seven years related experience, any pressures to ignore quality problems have been imposed through the off-site quality assurance management. The independence of the quality on-site inspection and audit personnel are adversely affected by the lack of ability of the off-site quality assurance management to withstand pressure from upper management (Engineering and Nuclear Operations). More emphasis should be placed on assuring the off-site quality assurance management is relieved of external pressures from company upper management, including his department superiors.

In summary, the ability of a quality assurance organization, both on-site and off-site, to function effectively and independently is highly dependent on the personality strengths and technical expertise of the corporate quality assurance manager. Minimum levels of experience, education and training should be established in the appropriate NRC Regulatory Guide specifically for the Quality Assurance Manager.

ROCHESTER GAS AND ELECTRIC CORP.
DATE January 19, 1981
TO Secretary of the Commission

Thank you for consideration of my comments.

Yours truly,

Scott V. Bullock
Scott V. Bullock

SVB:dmaD18



Acknowledged by card... *1/22/81*

8102260 515